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March 26, 2025

VIA ECF

The Honorable Renée Marie Bumb
United States District Court Judge
District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets, Room 1050
Camden, NJ 08101

Special Master the Honorable Thomas Vanaskie
Stevens & Lee
1500 Market Street, East Tower
18th Floor
Philadelphia, PA 19103

**Re: *In re: Valsartan, Losartan, and Irbesartan Products Liability Litigation.*,
U.S. District Court for the District of New Jersey; Case No. 1:19-md-02875**

Dear Judge Bumb and Special Master Vanaskie:

This letter is to provide Defendants' positions with respect to the topics on the agenda for the Case Management Conference on March 28, 2025. Defendants do not expect the need to discuss any confidential materials as part of these agenda items.

1. Wave 3 Bellwether Cases

Now that the Wave 2 Bellwether Schedule is in place (ECF No. 2988), Defendants seek guidance from the Court on how to move forward with respect to the "Wave 3" bellwether cases involving Manufacturer Defendant entities that may potentially exercise *Lexecon* rights. Defendants note that a number of issues not present in Wave 2 will need to be considered as part of any Wave 3 bellwether workup, including but not limited to whether general causation evidence

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exists for any case involving NDEA impurities, briefing on jurisdictional issues, and disclosures, depositions, and Rule 702 motions for the parties' liability experts.

2. CMO-38 Product Identification Deficiencies

Cases Addressed at the March 3, 2025 Case Management Conference:

Institution of a product identification show cause process was an agenda item at the March 3, 2025 Case Management Conference ("CMC"). Since that time, the Court entered CMO-38 instituting a show cause process to begin at the March 28, 2025 CMC. As this is the first CMC since the entry of CMO-38, only "First Listing" cases are on this month's agenda and no show cause orders are being requested or require the Court's attention.

Pending Order(s) Show Cause – N/A

Second Listing Cases – Order to Show Cause Requested – N/A

First Listing Cases – Remaining Product Identification Deficiencies:

The following product identification issues remain unresolved. This list was provided to Plaintiffs' leadership on March 14, 2025, and a global meet and confer was held on March 21, 2025. Defendants have also been available for further discussion as needed. This is the first time these cases have been listed on this agenda. Accordingly, Defendants are not requesting orders to show cause with respect to any of the below cases at this time and will continue to meet and confer to attempt to resolve these deficiencies or obtain voluntary dismissals as appropriate.

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Plaintiff	Docket	Attorney	NDC(s) Produced	Deficiency	Entity(ies) to be Dismissed	Prior Dismissal Request(s)
John Avjian	24-cv-09463	Kendra Goldhirsch Chaffin Luhana LLP	65862055190 00378632577 33342007810 43547031509	Mylan Product-Post Date Recall	Mylan Laboratories Ltd., Mylan N.V., and Mylan Pharmaceuticals Inc.	December 2024
Dixie Buxton	23-cv-02933	David Hobbs Fleming, Nolen & Jez, L.L.P.	00078-0471-34 00078-0471-15 00781-5951-64 60505-3809-09 00591-2318-19	No recalled Mylan Product	Mylan Pharmaceuticals Inc., Mylan N.V., and Mylan Laboratories Ltd.	August 2023
Jeffery Davis	21-cv-12166	Gerald C. Brooks Serious Injury Law Group	43547031209 68180010409 00603634602 60505380709 65862055090 00781594992 0591231619 65862054890 33342007510	No Mylan Product	Mylan Laboratories Ltd., Mylan Pharmaceuticals Inc., Mylan N.V.	October 2022

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Plaintiff	Docket	Attorney	NDC(s) Produced	Deficiency	Entity(ies) to be Dismissed	Prior Dismissal Request(s)
Larry Dewitt	21-cv-19963	Madeline Pendley Levin Papatino Rafferty	6586255190 0378632577	Mylan Product- Post Date Recall	Mylan Laboratories Ltd., Mylan Pharmaceuticals Inc., Mylan N.V.	November 2022
Edward Jackson	20-cv-6589	David Hobbs Fleming, Nolen & Jez, L.L.P.	00078031534 00078047134 00078047115 00591231819 68180010109 00603634802 43547031409	No Mylan Product	Mylan Laboratories Ltd., Mylan Pharmaceuticals Inc., Mylan N.V.	March 2024
Priscilla Kleinman	19-cv-7152	Watts Law Firm LLP	43547036809 43547036703 51660014030	No Mylan Product	Mylan Laboratories Ltd., Mylan Pharmaceuticals Inc.	March 2024
Christopher Lang	24 -cv-8254	Kendra Goldhirsch Chaffin Luhana LLP	59746036390 33342006510 00378632477 33342007710	Mylan Product- Post Date Recall	Mylan Laboratories Ltd., Mylan Pharmaceuticals Inc.	October 2024

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Plaintiff	Docket	Attorney	NDC(s) Produced	Deficiency	Entity(ies) to be Dismissed	Prior Dismissal Request(s)
Billie LaPrairie J.O. LaPrairie	20-cv- 8238	Christy Hix Harrison Davis Steakley Morrison Jones	0591216919 3172274790 5166014290	No Mylan Product	Mylan Laboratories Ltd., Mylan Pharmaceuticals Inc., Mylan N.V.	November 2022
Donna Locke (dec'd) Gilbert Locke	20-cv- 8770	Madeline Pendley Levin Papatino Rafferty	4354731509	No Mylan Product	Mylan Laboratories Ltd.	March 2024
Shylaine Louissaint	21-cv- 7797	Andrew O'Conner Nagel Rice	N/A	No Mylan Product	Mylan Laboratories Ltd.	November 2022
Otis Rhoades (dec'd) Linda Rhoades	21-cv- 3785	Madeline Pendley Levin Papatino Rafferty	4354737009 0591217019	No Mylan Product	Mylan Laboratories Ltd., Mylan Pharmaceuticals Inc., Mylan N.V.	March 2024
Kevin Russell	25-cv- 00278	Nigh Goldenberg Raso & Vaughn	n/a	No Mylan Product	Mylan Laboratories Ltd., Mylan Pharmaceuticals Inc., Mylan N.V.	March 2025

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Plaintiff	Docket	Attorney	NDC(s) Produced	Deficiency	Entity(ies) to be Dismissed	Prior Dismissal Request(s)
Raymond Savelli	20-cv-16089	Madeline Pendley Levin Papatino Rafferty	0591231619 4354736909 0378581477	Mylan product- Post Date Recall	Mylan Laboratories Ltd., Mylan Pharmaceuticals Inc., Mylan N.V.	March 2024
Janet Snipe	24 -cv-04013	Kendra Goldhirsch Chaffin Luhana LLP	00378632177	Mylan Product- Post Date Recall	Mylan Laboratories Ltd., Mylan Pharmaceuticals Inc., Mylan N.V.	October 2024
Terri Stine Doug Stine	19-cv-20214	Heath Straka Axley Brynerson, LLP	33342007610	No Mylan Product	Mylan Laboratories Ltd., Mylan Pharmaceuticals Inc.	March 2024

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Plaintiff	Docket	Attorney	NDC(s) Produced	Deficiency	Entity(ies) to be Dismissed	Prior Dismissal Request(s)
Diane Troiano John Troiano	20-cv-2341	Michael Schafle Green & Schafle LLC	4354736703 4354736809 4354737009 4354731109 4354731209 4354731309 4354731409	No Mylan Product No Teva Product	Mylan Laboratories Ltd., Mylan Pharmaceuticals Inc., Mylan N.V. Teva Pharmaceuticals USA, Inc. and Teva Pharmaceutical Industries, Ltd.	October 2022 (Mylan) 9/29/23; 2/25/25 (Teva)
Kattie Tucker	19-cv-18331	Joe Lane The Cochran Law Firm	4354737009	No Mylan Product No Teva Product	Mylan N.V. Teva Pharmaceuticals, Ltd., Actavis, LLC, Actavis Pharma, Inc., and Teva Pharmaceuticals USA, Inc.	June 2024 (Mylan) 10/27/23; 2/26/25 (Teva)
Catherine Worsham	22-cv-00002	Morgan and Morgan	00093743498 00603634302 0378581577 4354737009 62332004790 6586257390 68180027909	Mylan Product- Post Date Recall	Mylan Laboratories Ltd., Mylan Pharmaceuticals Inc., Mylan N.V.	March 2024
Abdelmallek, Haney	23-cv-3842	Bernstein Liebhard	6586255190 62332008390	No Teva Product	Arrow Pharm (Malta) Ltd.	10/13/23; 2/25/25

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Plaintiff	Docket	Attorney	NDC(s) Produced	Deficiency	Entity(ies) to be Dismissed	Prior Dismissal Request(s)
Bykowski, Leslie	20-cv- 14248	Watts Guerra	5166014190 31722074690 65862057190	No Teva Product	Arrow Pharm (Malta) Ltd.	4/26/24; 2/25/25
E/O Alexandra Samocha	21-cv- 17384	Hollis Law Firm, P.A.	N/A	No Teva Product	Teva Pharmaceutical Industries, Ltd.; Teva Pharmaceuticals USA, Inc.; Actavis, LLC; Actavis Pharma, Inc.	4/26/24; 2/25/25
Ernsbarger, Loren	20-cv- 18796	Fleming, Nolen & Jez, LLP	51660014390 43547037009 00378581577 13668025090 65862057390 33342006510	No Teva Product	Arrow Pharm (Malta) Ltd. and Teva Pharmaceuticals USA, Inc.	5/3/24; 2/25/25
Franklin, Jerry (Est. of Billye)	20-cv- 7860	Michael Brady Lynch Firm	6586254790 6586257190 0378632177 3454736809 0378632177	No Teva Product	Teva Pharmaceutical Industries, Ltd.; Teva Pharmaceuticals USA, Inc.; Actavis, LLC; Actavis Pharma, Inc.; Arrow Pharm (Malta) Ltd.	10/10/24; 2/25/25

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Plaintiff	Docket	Attorney	NDC(s) Produced	Deficiency	Entity(ies) to be Dismissed	Prior Dismissal Request(s)
Mabie, Lucille	19-cv- 18563	Hollis Law Firm, P.A.	68180010309 65862054790 00378632177 43547031109	No Teva Product	Teva Pharmaceutical Industries, Ltd., Actavis, LLC, Actavis Pharma, Inc., and Teva Pharmaceuticals USA, Inc.	5/31/24; 2/25/25
May, Mona	21-cv- 7634	Nigh Goldenberg	0781561892 4354736909	No Teva Product	Teva Pharmaceutical Industries, Ltd., Actavis, LLC, Actavis Pharma, Inc., and Teva Pharmaceuticals USA, Inc.	4/26/24; 2/26/25
Montalbano, Annette	23-cv- 22904	The Barnes Firm	N/A	No Teva Product	Arrow Pharm (Malta) Ltd..	3/3/25
Mottie, Maurice	22-cv- 06304	Fleming, Nolen & Jez, LLP	00078047234 0378632577 0378632477 1366811890 60505381009 3334207810 3334207815 4354731509	No Teva Product	Teva Pharmaceuticals USA, Inc.	5/3/24; 2/26/25

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Plaintiff	Docket	Attorney	NDC(s) Produced	Deficiency	Entity(ies) to be Dismissed	Prior Dismissal Request(s)
Peyton, Katherine	21-cv- 09063	DeGaris	00378581577	No Teva Product	Teva Pharmaceutical Industries, Ltd.	5/3/24; 2/26/25
Pierre- Francois, Wiener	21-cv- 17936	Labaton (Newman Dube)	00078048915 00378172293 49884057511 65862020290 68180037803	No Teva Product	Teva Pharmaceutical Industries Ltd.	5/31/24; 2/26/25
Polita, Adelaide o/b/o Frank Annunziato	20-cv- 7879	Michael Brady Lynch Firm	4354731209 6586254890	No Teva Product	Arrow Pharm (Malta) Ltd.	10/20/23; 2/26/25
Sanders, Ada	20-cv- 7884	Michael Brady Lynch Firm	3172274890 0378632577	No Teva Product	Teva Pharmaceuticals USA, Inc.	10/20/23; 2/26/25
Smoot, Lee	20-cv- 7994	Michael Brady Lynch Firm	6586257390 4354736809	No Teva Product	Arrow Pharma (Malta) Ltd.	10/10/23; 2/26/25

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Plaintiff	Docket	Attorney	NDC(s) Produced	Deficiency	Entity(ies) to be Dismissed	Prior Dismissal Request(s)
Stiles, Debra	22-cv-1987	Pittman Dutton	65862057190 43547036809	No Teva Product	Arrow Pharm (Malta) Ltd.	10/27/23; 2/26/25
Taggart, Joyce	20-cv-8802	Fleming, Nolen & JEZ, LLP	00078035917 00078035934 00781595092 000378632377 00378632305	No Teva Product	Teva Pharmaceuticals USA, Inc.	5/3/24; 2/26/25
Taylor, Barbara	21-cv-19430	Fleming, Nolen & JEZ, LLP	00378581477 51660014290 00781561892 68180027809 31722074790 00603634202 43547036909 65862020190 65862020299	No Teva Product	Teva Pharmaceuticals USA, Inc.	5/3/24; 2/26/25
Thomas, Jason	20-cv-15091	Scott Morgan	00378632177	No Teva Product	Teva Pharmaceuticals USA, Inc.	10/20/23; 2/26/25
Thornton, Ricky	20-cv-16078	Watts Guerra	6586254790 6233207990 00603634502 33342007410	No Teva Product	Arrow Pharm (Malta) Ltd.	4/26/24; 2/26/25

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Plaintiff	Docket	Attorney	NDC(s) Produced	Deficiency	Entity(ies) to be Dismissed	Prior Dismissal Request(s)
Tippett, Gary	22-cv-00826	Pittman Dutton	00378632177 43547031190 65862054790	No Teva Product	Arrow Pharm (Malta) Ltd., Teva Pharmaceutical Industries, Ltd., and Teva Pharmaceuticals USA, Inc.	9/29/23; 2/26/25
Tolley, Margaret	21-cv-10130	DeGaris	00378581377	No Teva Product	Teva Pharmaceuticals USA, Inc.	5/3/24; 2/26/25
Torghele, Daniel	19-cv-21034	Shrager, Spivey & Sachs	00378632377 681800010509 51660014290 43547036909 00378581477	No Teva Product	Arrow Pharm (Malta) Ltd.	10/20/23; 2/26/25
Vindigni, Richard	21-cv-02361	Julian Bailey	3177274690 4354736809	No Teva Product	Teva Pharmaceutical Industries, Ltd., Teva Pharmaceuticals USA, Inc.	5/31/24; 2/26/25
Wallace, William	22-cv-92	Labaton (Newman Dube)	00781595264 65862055190 00781595292 60505381009 68180010209 43547031509	No Teva Product	Arrow Pharm (Malta) Ltd.	5/31/24; 2/26/25

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Plaintiff	Docket	Attorney	NDC(s) Produced	Deficiency	Entity(ies) to be Dismissed	Prior Dismissal Request(s)
Wesley, Mary	20-cv- 8587	Vogelzang Law	65862057190 43547036809 00781560892 68180027703	No Teva Product	Arrow Pharm (Malta) Ltd.	10/20/23; 2/26/25
Williams, Ernestine	21-cv- 6946	Douglas & London	00378632305	No Teva Product	Teva Pharmaceuticals USA, Inc.	5/3/24; 2/26/25

3. PFS Deficiencies and Orders to Show Cause

Cases Addressed at the March 3, 2025 Case Management Conference:

Plaintiff Fact Sheet Deficiencies and Orders to Show Cause were last an agenda item at the March 3, 2025 Case Management Conference (“CMC”). The parties did not request any orders to show cause and no action is needed on any pending orders to show cause at this time.

Second Listing Cases – Order to Show Cause Requested:

Pursuant to CMO-16, the Plaintiff Fact Sheets in the below cases are substantially incomplete and contain core deficiencies. Each of these cases was previously listed on the agenda for a prior CMC. This list was provided to Plaintiffs’ leadership on March 14, 2025, and a global meet and confer was held on March 21, 2025. Defendants have also been available for further discussion as needed. Accordingly, Defendants request that an Order to Show Cause be entered in

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each of these cases, returnable at the next case management conference, as to why these cases should not be dismissed.

	Plaintiff	Civil Action No.	Law Firm	Deficiencies	Deficiency Sent
1.	Mark McNall v. Aurobindo, et al.	23-cv-21327	Fleming Nolen	Missing medical expense records for Palm Bay Physical Therapy.	2/21/24
2.	Edron Harris v. Doe	24-cv-546	Parafinczuk Wolf	No pharmacy records as to any Defendant. Only John Doe named in complaint.	3/22/24
3.	Soraya Svoronos v. Torrent, et al.	23-cv-22220	Dell and Dean PLLC	No authorizations. Dietary questions blanks.	3/22/24
4.	Harry Wicks v. ZHP, et al.	24-cv-6188	Nigh Goldenberg	PFS substantially incomplete. No records, no authorizations.	8/12/24
5.	Shirley Thomas v. Aurobindo Pharma, Ltd., et al.	1:23-cv-01700	Terrell Hogan	Failure to upload health care and insurance authorizations. Failure to provide signed and dated declaration. Included NDC code for non-recalled AB losartan.	08/14/2024

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6.	Robert Jaskulski	24-cv-5752	Nigh Goldenberg	No medical records.	9/10/24
7.	E/O Betty Baker v. Teva, et al.	20-cv-17108	Watts Guerra	No PFS Filed	PFS Due – 1/24/21
8.	Teresa Esrig v. Torrent, et al.	22-cv-244	Rios Law Firm	No PFS Filed	PFS Due – 2/29/22
9.	Christopher Hurst v. Teva, et al.	23-cv-20308	Pro Se	No PFS Filed	PFS Due – 2/7/24
10.	George Stokes v. ZHP, et al.	21-cv-20419	Powell & Swanick	No PFS Filed	PFS Due – 1/18/22
11.	Yolanda Williams v. Hetero, et al.	23-cv-13792	Cronauer Law, LLP	No PFS Filed	PFS Due – 4/7/24

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First Listing Cases – Remaining Core Deficiencies:

The following Plaintiff Fact Sheet contains core deficiencies which remain unresolved. This list was provided to Plaintiffs' leadership on March 14, 2025, and a global meet and confer was held on March 21, 2025. Defendants have also been available for further discussion as needed. This is the first time this case has been listed on an agenda. Accordingly, Defendants are not requesting orders to show cause with respect to the below case at this time and will continue to meet and confer to resolve the deficiencies.

	Plaintiff	Civil Action No.	Law Firm	Deficiencies	Deficiency Sent
1.	Oscar Jarquin v. Aurobindo, et al.	24-cv- 11515	Levin Papantonio	No PFS Filed	PFS Due – 3/1/25

Defendants look forward to discussing these issues and any others the Court wishes to address at the upcoming Case Management Conference.

Sincerely,

/s/ Victoria Davis Lockard
Victoria Davis Lockard, Esq.

cc: All counsel of record (via ECf)